

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

---

In re BARRICK GOLD SECURITIES LITIGATION : Civil Action No. 1:13-cv-03851-RMB  
: CLASS ACTION  
:   
:   
x

---

NOTICE OF LEAD PLAINTIFFS' UNOPPOSED MOTION FOR  
PRELIMINARY APPROVAL OF SETTLEMENT

PLEASE TAKE NOTICE that Lead Plaintiffs LRI Invest S.A. and Union Asset Management Holding AG, on behalf of the certified class, will move this Court on June 23, 2016 at 10:00 am, or such other date and time set by the Court, for an Order, pursuant to Rule 23(e) of the Federal Rules of Civil Procedure: (a) preliminarily approving the proposed Settlement; (b) approving the proposed form of the long-form notice and summary notice of the Settlement; (c) approving the proposed methods of disseminating notice to the certified class; (d) setting a date for the Settlement Hearing; and (e) such other and further relief as this Court deems just and proper. Defendants do not oppose the motion.

Lead Plaintiffs are contemporaneously filing a memorandum of law and Declaration of James M. Hughes, dated May 31, 2016, with annexed exhibits, in support of this motion.

A proposed Order Preliminarily Approving Settlement and Providing for Notice, which was negotiated by the parties to the Settlement, is also submitted herewith.

DATED: May 31, 2016

Respectfully submitted,

MOTLEY RICE LLC

---

*/s/ James M. Hughes*

JAMES M. HUGHES

James M. Hughes (*pro hac vice*)  
Christopher F. Moriarty (*pro hac vice*)  
28 Bridgeside Blvd.  
Mt. Pleasant, South Carolina 29464  
Telephone: (843) 216-9000  
Facsimile: (843) 216-9450  
jhughes@motleyrice.com  
cmoriarty@motleyrice.com

MOTLEY RICE LLC

William H. Narwold  
One Corporate Center  
20 Church Street, 17<sup>th</sup> Floor  
Hartford, CT 06103  
Telephone: (860) 882-1676  
BNarwold@motleyrice.com

*Lead Counsel for Lead Plaintiffs and the Class*

LABATON SUCHAROW LLP

Jonathan Gardner  
Serena P. Hallowell  
140 Broadway  
New York, New York 10005  
Telephone: (212) 907-0700  
Facsimile: (212) 818-0477  
jgardner@labaton.com  
shallowell@labaton.com

*Liaison Counsel for Lead Plaintiffs and the Class*

CERTIFICATE OF SERVICE

I, James M. Hughes, hereby certify that on May 31, 2016, I caused a true and correct copy of the attached Notice of Lead Plaintiffs' Unopposed Motion For Preliminary Approval of Settlement to be electronically filed with the Clerk of the Court using the CM/ECF system, which will send notification of such public filing to all counsel of record.

*/s/ James M. Hughes*

JAMES M. HUGHES